

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JOSE SANCHEZ, on behalf of himself and all
other persons similarly situated,

Plaintiff,

v.

CLEANNET USA, INC. and CLEANNET OF
ILLINOIS, INC.,

Defendants.

Case No. 14-cv-02143

Judge James B. Zagel

**MOTION OF DEFENDANTS CLEANNET USA, INC. AND CLEANNET OF ILLINOIS,
INC. TO DISMISS OR STAY, OR IN THE ALTERNATIVE, TO COMPEL
ARBITRATION AND STAY PENDING ALTERNATIVE DISPUTE RESOLUTION**

Defendants CleanNet U.S.A., Inc. ("CleanNet USA") and CleanNet of Illinois, Inc. ("CleanNet IL") hereby move to dismiss or, in the alternative, stay Plaintiff's First Amended Complaint pursuant to Section 3 of the Federal Arbitration Act ("FAA") on the ground that Plaintiff's individual claims are subject to final and binding arbitration pursuant to the dispute resolution provisions in his franchise agreement with CleanNet IL, which contains a class action waiver. In the alternative, CleanNet USA and CleanNet IL move to compel arbitration of Plaintiff's individual claims and stay this litigation pursuant to Section 4 of the FAA.

In support of their motion, CleanNet USA and CleanNet IL have attached their supporting Memorandum of Law, a true and correct copy of Plaintiff's Franchise Agreement, and the Declaration of Darren M. Mungerson.

Dated: September 16, 2014

Respectfully submitted,

/s/ Darren M. Mungerson

Darren M. Mungerson (IL #6256434)

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Attorneys for Defendants

CLEANNET USA, INC. and CLEANNET OF
ILLINOIS, INC.

CERTIFICATE OF SERVICE

I, Darren M. Mungerson, hereby certify that I caused the foregoing *Motion of CleanNet USA and CleanNet IL to Dismiss or Stay, or in the Alternative, to Compel Arbitration and Stay Pending Alternative Dispute Resolution*, to be filed with the Court via the Court's CM/ECF system and served via the same method upon the following:

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Dated: September 16, 2014

/s/ Darren M. Mungerson
Darren M. Mungerson

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